

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ROBERT CYRUS

Plaintiff,

vs.

**HYUNDAI MOTOR COMPANY,
HYUNDAI MOBIS, INC. (formerly known
as HYUNDAI PRECISION CO.),
HYUNDAI TRANSLEAD (formerly known
as HYUNDAI PRECISION CO.)
HYUNDAI MOTOR AMERICA, and
HYUNDAI MOTOR MANUFACTURING
OF ALABAMA, LLC,**

Defendants.

CIVIL ACTION NO.:

2:06-cv-568-WKW

REPORT OF THE PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting of the parties' representatives was held on August 9, 2006, at the law offices of Ogletree Deakins between counsel for the plaintiff and counsel for the defendants.

Appearing on behalf of plaintiff:

Richard J. Stockham, III
STOCKHAM & STOCKHAM
2204 Lakeshore Drive
Homewood, Alabama 35209

Appearing on behalf of defendant Hyundai Motor Manufacturing Alabama, LLC:

Brian R. Bostick
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
One Federal Place, Suite 1000
1819 5th Avenue North
Birmingham, Alabama 35203

Appearing on behalf of defendant Hyundai Motor America:

Wyndall Ivey
MAYNARD, COOPER & GALE, P.C.
1901 6TH Avenue North, Suite 2400
Birmingham, Alabama 35203-2618

2. Pre-Discovery Disclosures:

The parties disagree on when the information required by Local Rule 26.1(a)(1) should be disclosed. Defendants propose September 15, 2006. Plaintiff proposes November 1, 2006.

3. Discovery Plan:

The parties jointly propose to the Court the following discovery plan:

a. Discovery will be needed on plaintiff's claims and alleged damages, and defendants' asserted defenses.

b. All discovery must be commenced in time to be completed by June 1, 2007.

Depositions:

Maximum of 7 depositions for each party with a maximum time limit of 8 hours per deposition (except for plaintiff's deposition, which is limited to 10 hours), unless extended by agreement of the parties.

Interrogatories:

Maximum of 25 by each party, with responses due within 30 days after service.

Request for Admissions:

Maximum of 25 by each party, with responses due within 30 days after service.

Request for Production:

Maximum of 25 by each party, with responses due within 30 days after service.

Expert Testimony:

Unless modified by stipulation of the parties, the disclosure of expert witnesses - including a complete report under Fed. R. Civ. P. 26(a)(2)(B) from any specially retained or employed expert - are due:

From the plaintiff on or before December 1, 2006.
From the defendants on or before March 1, 2007.

Supplementation:

Supplementations under Rule 26(e), Fed. R. Civ. P., within a reasonable period of time after discovery of such information.

4. Other Items:

a. The parties do not request a scheduling conference prior to the entry of the Scheduling Order.

b. The parties request a pre-trial conference at some point after all dispositive motions have been ruled upon.

c. The plaintiff shall have until November 1, 2006, to amend the pleadings or add parties. The defendants shall have until December 1, 2006, to amend the pleadings or add parties.

d. All potentially dispositive motions must be filed by May 1, 2007.

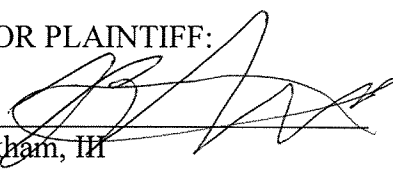
e. Settlement cannot be evaluated prior to conducting some initial discovery.

f. Final lists of trial witnesses and exhibits under Fed. R. Civ. P. 26(a)(3) must be served and filed by the plaintiff on or before 45 days before trial, and by the defendants on or before 30 days before trial. Objections are to be filed and served within 15 days after receipt of final lists.

g. The parties request that this case be scheduled for trial on the docket set for July 9, 2007. Trial is expected to last approximately 5 days.

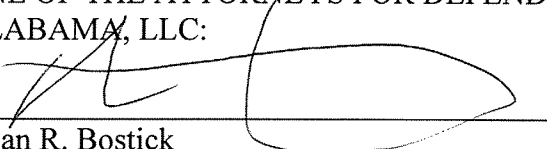
Respectfully submitted this 9th day August, 2006.

ATTORNEY FOR PLAINTIFF:



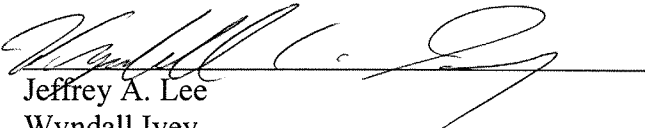
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